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Attorneys for Plaintiff, the Collective, and  
putative Class, and Aggrieved Employees  
on behalf of the State of California

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

PAUL MONPLAISIR, on behalf of himself and all others similarly situated,

| Case No.: 3:19-cv-01484-WHA

### **Plaintiffs.**

VS.

## INTEGRATED TECH GROUP, LLC and ITG COMMUNICATIONS LLC.

## Defendants

**PLAINTIFF'S NOTICE OF MOTION AND  
MOTION FOR CLASS CERTIFICATION**

Date: February 6, 2020  
Time: 8:00 a.m.  
Ctrm.: 12, 19th Floor

Judge: Hon. William Alsup

Complaint Filed: March 21, 2019  
Trial Date: October 19, 2020

1 **TO ALL PARTIES AND ATTORNEYS OF RECORD:**

2 **NOTICE IS HEREBY GIVEN** that at 8:00 a.m. on February 6, 2020 Plaintiff Paul  
3 Monplaisir (“Plaintiff”) moves this Court for an order:

4 (1) Certifying the following class under Fed. R. Civ. P. 23(a), 23(b)(3) for claims of: (i)  
5 failing to pay proper minimum wage, overtime wages, and completed piece rates; (ii) failing to  
6 provide a reasonable opportunity to take meal and rest periods, and failing to properly compensate  
7 Class members when such meal and rest periods were not taken; (iii) failing to reimburse  
8 necessarily-incurred business expenses; and (iv) failing to issue accurate, itemized wage statements  
9 in violation of the California Labor Code:

10 All current and former non-exempt hourly employees of ITG working as  
11 Technicians throughout the State of California from March 21, 2015 until  
the resolution of this action (the “Class”).

12 (2) Appointing Paul Monplaisir as representatives of the Class;

13 (3) Appointing the law firms of Schneider Wallace Cottrell Konecky Wotkyns LLP and  
14 Berger & Montague, P.C. as Class Counsel, pursuant to Fed. R. Civ. P. Rule 23(g); and

15 (4) Pursuant to Fed. R. Civ. P. 23(c)(2)(B), ordering that the class be given best practical  
16 notice under the circumstances.

17 Plaintiffs’ motion is based upon (a) this Notice of Motion and Motion; (b) the Memorandum  
18 of Points and Authorities; (c) the Declaration of Proposed Class Counsel Carolyn H. Cottrell; (d)  
19 the Declaration of Proposed Class Counsel Michelle S. Lim; (e) the Declaration of Proposed Class  
20 Counsel Sarah R. Schalman-Bergen; (f) the Declarations of ten Proposed Class Members; (g) any  
21 argument of counsel as may be presented at the class certification hearing; and (h) the pleadings  
22 and files in this action.

23 Dated: December 19, 2019

24 Respectfully Submitted,

25 /s/ Ori Edelstein

26 Carolyn Hunt Cottrell (SBN 166977)

27 Ori Edelstein (SBN 268145)

28 Michelle S. Lim (SBN 315691)

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21 putative Class, and Aggrieved Employees  
22 on behalf of the State of California  
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